

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

CHRISTOPHER HENDERSON, et al.

No. 18 CR 284

Judge Edmond E. Chang

**MOTION FOR ENTRY OF UNOPPOSED
PROTECTIVE ORDER GOVERNING DISCOVERY**

Pursuant to Fed. R. Crim. P. 16(d), the United States of America, by JOHN R. LAUSCH, JR., United States Attorney for the Northern District of Illinois, moves for the entry of an unopposed protective order, and in support thereof states as follows:

1. The indictment in this case charges defendants CHRISTOPHER HENDERSON, JOHN L. PHILLIPS, and JAIQAIL WRIGHT with engaging in the business of dealing in firearms without a license, in violation of 18 U.S.C. § 922(a)(1)(A) (Count 1). HENDERSON and PHILLIPS are charged with traveling to another State to engage in the business of dealing in firearms, in violation of 18 U.S.C. § 924(n) (Counts 2, 4-8). PHILLIPS and WRIGHT are charged with being a felon in possession of a firearm or ammunition, in violation of 18 U.S.C. § 922(g)(1) (Counts 9 and 11). PHILLIPS is charged with obtaining firearms outside of Illinois and transporting them into Illinois, in violation of 18 U.S.C. §§ 922(a)(3) and 924(a)(1)(D) (Counts 3 and 10). Finally, PHILLIPS is charged with attempting to destroy and conceal Facebook records, in violation of 18 U.S.C. § 1512(c)(1) (Count 12). *See* Dkt. No. 49.

2. The discovery to be provided by the government in this case includes sensitive information, whose unrestricted dissemination could adversely affect law enforcement interests and the privacy interests of third parties.

3. The government has discussed the proposed protective order with counsel for defendants, who do not oppose the entry of the proposed order.

WHEREFORE, the government respectfully moves this Court to enter the proposed protective order.

Respectfully submitted,

JOHN R. LAUSCH, JR.
United States Attorney

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Dated: August 2, 2018